

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BERNADINE T. GRIFFITH

Plaintiff,

v.

**ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES**

Defendants.

C.A. No. 03-CV-12573-EFH

**DEFENDANTS' MOTION FOR LEAVE TO FILE
REPLY MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Local Rule 7.1B(3), Defendants OneBeacon Insurance Company, OneBeacon America Insurance Company, (together, "OneBeacon"), Karen Allen Holmes ("Holmes"), and Michael A. Sisto ("Sisto") (collectively, "Defendants") hereby seek leave to file a reply memorandum in support of their Motion for Judgment on the Pleadings.¹ As grounds for their motion, Defendants state that Plaintiff's Opposition contains arguments and representations regarding case law not addressed in Defendants' original motion. In an effort to further clarify the matter for the Court, Defendants seek leave to reply.

¹ The original Motion for Judgment on the Pleadings was brought by Defendants Holmes and Sisto. Without altering the original motion, the remaining OneBeacon Defendants join the original Motion for Judgment on the Pleadings. The instant motion is filed on behalf of all Defendants.

Respectfully submitted,

ONEBEACON INSURANCE CO.,
ONEBEACON AMERICA INSURANCE CO.,
MICHAEL A. SISTO, and
KAREN ALLEN HOLMES

By their attorneys

/s/ Leah M. Moore
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Dated: June23, 2005

CERTIFICATE OF SERVICE

I, Leah M. Moore, hereby certify that on this 23rd day of June 2005, I caused a true and correct copy of the foregoing to be served via first class mail upon Kathleen J. Hill, Esq., Attorney for Plaintiff, Law Office of Kathleen J. Hill, 92 State Street, Suite 700, Boston, Massachusetts 02109, being the address designated by said attorney for service of all pleadings.

/s/ Leah M. Moore
Leah M. Moore